

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

GENERAL ACCESS SOLUTIONS, LTD.,

Plaintiff,

v.

CELLCO PARTNERSHIP D/B/A VERIZON  
WIRELESS, VERIZON SERVICES CORP.,  
VERIZON BUSINESS GLOBAL LLC,  
VERIZON BUSINESS NETWORK SERVICES  
LLC, VERIZON CORPORATE SERVICES  
GROUP INC., VERIZON DATA SERVICES  
LLC, and VERIZON ONLINE LLC,

Defendants,

ERICSSON, INC.,

Intervenor-Defendant.

Case No. 2:22-cv-00394 JRG

JURY TRIAL DEMANDED

**JOINT CLAIM CONSTRUCTION AND PREHEARING STATEMENT**

Pursuant to the Court's First Amended Docket Control Order entered May 25, 2023 (Dkt. 55) and the Patent Local Rules for the Eastern District of Texas ("Patent Rules" or "P.R."), Plaintiff General Access Solutions, Ltd. ("General Access") and Defendants Cellco Partnership d/b/a Verizon Wireless, Verizon Services Corp., Verizon Business Global LLC, Verizon Business Network Services LLC, Verizon Corporate Services Group Inc., Verizon Data Services LLC, and Verizon Online LLC (collectively, "Verizon") and Intervenor-Defendant Ericsson, Inc. (collectively, "Defendants") hereby submit their Joint Claim Construction and Prehearing Statement.

**I. Construction of Claim Terms on Which the Parties Agree**

The parties have agreed to withdraw multiple terms, but have not reached agreement on any terms for construction.

## **II. Disputed Claim Terms/Phrases**

See Exhibit A for a chart showing the parties' proposed constructions with intrinsic and extrinsic evidence supporting such constructions.<sup>1</sup> All parties reserve the right to rely upon any intrinsic or extrinsic evidence identified by any other party, and any evidence obtained through claim construction discovery. In addition, each party reserves the right to amend, correct, or supplement its claim construction positions and supporting evidence in response to any change of position by any other party, or for other good cause.

## **III. Anticipated Length of Time for Claim Construction Hearing**

The Claim Construction Hearing is set to begin at 9:00 a.m. in Marshall, Texas before Judge Rodney Gilstrap on December 12, 2023. The parties believe that no more than three (3) hours should be necessary for a claim construction hearing.

## **IV. Anticipated Witnesses at the Claim Construction Hearing**

No party will call any live witnesses at the claim construction hearing.

## **V. Other Issues to be Addressed at a Prehearing Conference Prior to the Claim Construction Hearing**

At this time, the parties are not aware of any other issues that might be appropriately addressed at a prehearing conference prior to the Claim Construction Hearing.

Dated: September 19, 2023

Respectfully submitted,

By: /s/ Glen E. Summers w/permission Andrea Fair

Glen E. Summers (CO Bar No. 30635)

LEAD ATTORNEY

Nosson D. Knobloch (CO Bar No. 42134)

Sten A. Jernudd (Colorado Bar No. 58402)

**BARTLIT BECK LLP**

1801 Wewatta Street, Suite 1200

Denver, CO 80202

Telephone: (303) 592-3100

[glen.summers@bartlitbeck.com](mailto:glen.summers@bartlitbeck.com)

[nosson.knobloch@bartlitbeck.com](mailto:nosson.knobloch@bartlitbeck.com)

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<sup>1</sup> Because GAS has not accused any Ericsson product or service of infringing the '794 Patent, Ericsson provides this disclosure only with respect to the '931 Patent.

sten.jernudd@bartlitbeck.com

Michael J. Valaik (IL Bar No. 6276086)

**BARTLIT BECK LLP**

54 West Hubbard Street, Suite 300

Chicago, IL 60654

Telephone: (312) 494-4400

michael.valaik@bartlitbeck.com

T. John Ward, Jr. (TX Bar No. 00794818)

Charles Everingham IV (TX Bar No. 00787447)

Andrea L. Fair (TX Bar No. 24078488)

**WARD, SMITH & HILL, PLLC**

1507 Bill Owens Pkwy.

Longview, TX 75604

Telephone: (903) 757-6400

jw@wsfirm.com

ce@wsfirm.com

andrea@wsfirm.com

*Attorneys for Plaintiff General Access Solutions, Ltd.*

/s/ Katherine Q. Dominguez w/permission Andrea Fair

Katherine Q. Dominguez (NY Bar No. 4741237)

LEAD ATTORNEY

kdominguez@gibsondunn.com

Josh A. Krevitt (NY Bar No. 2568228)

jkrevitt@gibsondunn.com

Brian A. Rosenthal (NY Bar No. 3961380)

broenthal@gibsondunn.com

Sung Bin Lee (NY Bar No. 5701099)

slee3@gibsondunn.com

**GIBSON, DUNN & CRUTCHER LLP**

200 Park Avenue

New York, NY 10166-0193

Telephone: (212) 351-4000

Jaysen S. Chung (CA Bar No. 280708)

jschung@gibsondunn.com

**GIBSON, DUNN & CRUTCHER LLP**

555 Mission Street

San Francisco, CA 94105-0921

Telephone: (415) 393-8271

Andrew W. Robb (CA Bar No. 291438)

arobb@gibsondunn.com

**GIBSON, DUNN & CRUTCHER LLP**

1881 Page Mill Road

Palo Alto, CA 94304  
Telephone: (650) 849-5334

Ashbey N. Morgan (TX Bar No. 24106339)  
anmorgan@gibsondunn.com  
**GIBSON, DUNN & CRUTCHER LLP**  
2001 Ross Avenue, Suite 2100  
Dallas, TX 75201  
Telephone: (214) 698-3112

Deron R. Dacus (TX Bar No. 00790553)  
ddacus@dacusfirm.com  
**THE DACUS FIRM, P.C.**  
821 ESE Loop 323, Suite 430  
Tyler, Texas 75701  
Telephone: (903) 705-1117

*Attorneys for Defendants Cellco Partnership d/b/a Verizon Wireless, Verizon Services Corp., Verizon Business Global LLC, Verizon Business Network Services LLC, Verizon Corporate Services Group Inc., Verizon Data Services LLC, and Verizon Online LLC (collectively, "Verizon")*

/s/ Douglas M. Kubehl w/permission Andrea Fair  
Douglas M. Kubehl (TX Bar No. 00796909)  
doug.kubehl@bakerbotts.com  
Jeffery S. Becker (TX Bar No. 24069354)  
jeff.becker@bakerbotts.com  
Melissa L. Muenks (TX Bar No. 24097442)  
melissa.muenks@bakerbotts.com  
**BAKER BOTTS L.L.P.**  
2001 Ross Avenue  
Dallas, TX 75201  
Telephone: (214) 953-6500  
Facsimile: (214) 953-6503

*Attorneys for Intervenor-Defendant Ericsson, Inc.*

**CERTIFICATE OF SERVICE**

Pursuant to Federal Rules of Civil Procedure and Local Rule CV-5, I hereby certify that a copy of the foregoing document was served via ECF to all counsel of record.

/s/ Andrea Fair  
Andrea Fair